

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
KEVIN D. SCHIFF
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
FAX: (702) 388-5087
Kevin.Schiff@usdoj.gov
Attorneys of the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:20-cr-0003-APG-EJY

Plaintiff,

Stipulation to Continue Evidentiary Hearing

(first request)

RAMON AVENDANO-SOTO, and

JORGE ALFREDO SOTO,

Defendants.

It is stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney; Kevin D. Schiff, Assistant United States Attorney, counsel for the United States of America and Raquel Lazo, Esq., counsel for defendant Avendano-Soto; and Christopher Oram, Esq., counsel for defendant Alfredo Soto:

That the evidentiary hearing set in this matter for October 6, 2020, be continued for approximately 30 days.

1. Counsel for each Defendant and the Government agree to the continuance.
2. Defendant Ramon Avendano-Soto is on pre-trial release and agrees to the continuance.

1 3. Defendant Jorge Alfredo Soto is on pre-trial release and agrees to the
2 continuance.

3 4. Drug Enforcement Administration Special Agent Gentile, who is the
4 Government's case agent, and necessary witness for the evidentiary hearing, recently
5 became unavailable for the evidentiary hearing as his presence is required in state court for
6 a personal matter. The Government inquired with Special Agent Gentile regarding the
7 plausibility of moving the state court hearing, and was informed the recently scheduled
8 date is firm, and is of critical importance.

9 DATED this 29th day of September, 2020.

10 NICHOLAS A. TRUTANICH
11 United States Attorney

12 /s/ Kevin Schiff
13 Kevin D. Schiff
13 Assistant United States Attorney

14 /s/ Raquel Lazo
15 Raquel Lazo, AFPD.
15 Counsel for Defendant Avendano-Soto

16 /s/ Christopher Oram
17 Christopher Oram, Esq.
17 Counsel for Defendant Alfredo Soto

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

2:20-cr-0003-APG-EJY

Plaintiff,

Order Pursuant to Stipulation of the Parties

VS.

RAMON AVENDANO-SOTO,

Defendant.

Based on the pending Stipulation of counsel, and good cause appearing therefore, the evidentiary hearing on the pending motions currently set for October 6, 2020, is hereby vacated, and continued to November 18, 2020, at 9:00 a.m. in Courtroom 3B.

IT IS SO ORDERED

Elayna J. Youchah
THE HONORABLE ELAYNA J. YOUCAH
UNITED STATES MAGISTRATE JUDGE

DATED: September 29, 2020